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Attorneys for Mark D. Waldron, Ch. 7 Trustee

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF WASHINGTON**

In re: Case No. 18-03197 FPC 11

GIGA WATT, Inc., a Washington corporation, | Chapter 7

Debtor.

**NOTICE OF (I) TRUSTEE'S MOTION
FOR AUTHORITY TO INCUR AND
PAY EXPENSES INCIDENT TO
DISCOVERY IN PERKINS
ADVERSARY AND (II) HEARING
THEREON**

Telephonic Hearing

Date: May 3, 2022
Time: 10:30 a.m. PT
Telephone: (509) 353-3183

PLEASE TAKE NOTICE THAT Mark D. Waldron, as Trustee

(“Trustee”) has filed the *Trustee’s Motion for Authority to Incur and Pay*

Expenses Incident to Discovery in Perkins Adversary (the “Motion”), dated April

20, 2022, ECF 946. The Motion and supporting papers may be obtained from the

Court's clerk. A telephonic hearing (the "Telephonic Hearing") will be held on the

Motion on May 3, 2022, at 10:30 a.m. Pacific Time. The call-in information is set

forth in the caption of this Notice. Pursuant to the Court's oral ruling on April 20,

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1 2022, if you wish to object to the Motion, you must file an **Objection** with the
2 Court and serve it upon undersigned counsel on or before **April 29, 2022**. The
3 Telephonic Hearing will be held even if no objection is timely filed and served.
4 However, untimely objections may not be considered without the Court's
5 permission.

6 By the Motion the Trustee is seeking authority to incur and pay the
7 following expenses incident to discovery in the Perkins Adversary:

	Comments	Subtotal	Total
Incurred Deposition Expense – Timur Usmanov	Transcript:	\$1,925.75	\$4,507.00
	Video:	\$1,737.50	
	One half the cost of the interpreter; Perkins Coie LLP (“Perkins”) has agreed to pay the other half.	\$843.75	
Anticipated Deposition Expenses	<u>1. Timur Usmanov (cont'd) – Giga Watt CFO from 1/1/2017 to 8/15/2017 (circa)</u>	\$1,000.00	\$4,507.00
	<u>2. David Carlson, Giga Watt's CEO from 1/1/2017 to 8/15/2017 (circa)</u>	\$2,500.00	
	<u>3. Mike Olmstead, a governor of Giga Watt who worked in the accounting department</u>	\$2,500.00	
	<u>4. Jeff Field – actively involved in construction of new facilities for WTT tokens</u>	\$2,500.00	
	<u>5. Travis Hibbard, principal of LT Equities LLC and Talos Construction, Inc. – who built the Giga Pods.</u>	\$2,500.00	
	<u>6. Katrina Arden – attorney for Giga Watt, Inc. before and during GW ICO (introduced the escrow concept to the GW ICO)</u>	\$2,500.00	

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	Comments	Subtotal	Total
	7. Lowell Ness – attorney at Perkins Coie overseeing escrow	\$2,500.00	\$16,000.00
E-Disc. Processing	Lighthouse, extraction, and processing as described in Section III hereof	\$9,600.00	\$9,600.00
Misc.	Circle, Intuit, and LT Equities, reasonable subpoena expense	\$2,000.00	\$2,000.00
			\$32,107.00

Dated: April 22, 2022

POTOMAC LAW GROUP PLLC

By: /s/ Pamela M. Egan
Pamela M. Egan (WSBA No. 54736)

*Attorneys for Mark D. Waldron, Chapter 7
Trustee*

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